

IN THE CIRCUIT COURT OF CLAY COUNTY, ARKANSAS
WESTERN DISTRICT
CIVIL DIVISION

FILED FOR RECORD

NINA ALLYN

PLAINTIFF 2016 FEB 11 A 9:53

V.

CASE NO. CIV-2016-3

JANET LUFFKILBREATH, CLERK

BARBARA WOOLARD AND
THE UNITED STATES DEPARTMENT OF AGRICULTURE

DEFENDANTS BY AS

ANSWER

The defendant, Barbara Woolard, by and through her attorney, Mike Trail, and for her Answer, states as follows:

1. The defendant admits that both plaintiff and defendant are residents of the Western District of Clay County, Arkansas. The defendant denies that the United States Department of Agriculture pays her any money or that the Court has jurisdiction over the United States Department of Agriculture.

2. The defendant denies the allegations contained in paragraph two of plaintiff's complaint.

3. The defendant denies the allegations contained in paragraph three of the plaintiff's complaint.

4. The defendant denies that Exhibit "A", mentioned in paragraph four of plaintiff's complaint, is a valid deed and denies that the plaintiff is an owner of the property described therein.

5. The defendant admits that Exhibit "B", mentioned in paragraph five of plaintiff's complaint is a valid deed.

6. The defendant denies the allegations contained in paragraph six of

Exhibit B

plaintiff's complaint.

7. The defendant denies the allegations contained in paragraph seven of plaintiff's complaint.

8. The defendant denies the allegations contained in paragraph eight of plaintiff's complaint.

9. The defendant denies the allegations contained in paragraph nine of plaintiff's complaint.

10. The defendant asserts the affirmative defenses of fraud and set off

11. The defendant denies all allegations contained in the plaintiff's complaint not specifically admitted to herein.

12. The defendant asserts that not all necessary parties are included in this lawsuit herein.

13. The defendant prays for an award of attorney's fees for the defense of this frivolous matter.

WHEREFORE, the defendant, Barbara Woolard, prays that the complaint of the plaintiff be dismissed and held for naught, for an award of attorney's fees and for all other relief to which she is entitled.

Respectfully Submitted,

Mike Trail
Attorney at Law
114 W. 4th St.
P.O. Box 45
Rector, AR 72461
(870) 595-1020

BY: Mike Trail
Mike Trail, Attorney for the Defendant
AR Bar No. 97212

Certificate of Service

The undersigned, states under oath the above-titled pleading has been served on opposing counsel or the opposing party by mailing it, U.S. mail, postage prepaid, to the attorney for the plaintiff, John Ogles, P.O. Box 891, Jacksonville, AR 72078, on the 11th day of February, 2016.

Mike Trail
Mike Trail